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 Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

TAMMI J. JOHNSON,)	
)	
Plaintiff,)	CASE NO.
)	2:24-cv-01156-EJY
v.)	
)	UNOPPOSED MOTION
)	FOR EXTENSION OF TIME TO FILE
MARTIN O'MALLEY,)	PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	
)	

Plaintiff, Tammi J. Johnson, by her attorney, moves for a thirty-two (32) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed October 21, 2024.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to prepare Plaintiff's brief properly and thoroughly. For instance, between September 6, and October 18, 2024, staff in Counsel's office have one hundred and eight (108) Plaintiff briefs due. This figure does not include briefings which will be due after the filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly

1 prepare the brief by the current deadline. This request will not cause Defendant any undue
2 hardship. This extension is needed to prepare the brief thoroughly and properly.

3 Wherefore, Plaintiff requests an extension from September 19, 2024, up to and including
4 October 21, 2024, to file her brief. Counsel for the Plaintiff has conferred with Defendant's
5 Counsel who has no objection to this request.

6 Dated September 12, 2024.

7 Respectfully submitted,

8 /s/Hal Taylor

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17 Attorney for Plaintiff

18 IT IS SO ORDERED.

19 
20 U.S. Magistrate Judge

21 Date: September 13, 2024
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